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Attorneys for Defendant and Counterclaimant
ROKID, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JUN FU, an individual,

Plaintiff,

V.

ROKID, INC.; and DOES 1 through 25, inclusive.

Defendants.

Case No. 3:23-cv-04327-LB

**DECLARATION OF ANGEL R.
SEVILLA IN SUPPORT OF THE
STIPULATION AND [PROPOSED
ORDER] CONTINUING THE
MEDIATION DATE AND FACT
DISCOVERY DEADLINE**

*[File concurrently with Stipulation and
[Proposed] Order]*

State Complaint Filed: August 17, 2023
Removal Date: August 23, 2023
Trial Date: March 3, 2025

ROKID, INC.

Counterclaimant,

V.

JUN FU: DOES 1-100, inclusive,

Counter-Defendants

1 I, Angel R. Sevilla, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and admitted to appear
 3 before this Court. I am a Principal with the law firm of Jackson Lewis P.C., counsel of record in
 4 this matter for Defendant ROKID, INC. (“Defendant”). I have personal knowledge of the matters
 5 stated herein, and if called to testify as to these matters, I could and would do so competently.

6 2. I make this declaration in support of the concurrently filed Stipulation to Modify the
 7 Case Management Order and Request a Case Management Conference the above-referenced
 8 matter (the “Action”) pursuant to Civil Local Rules (“L.R.”) 6-1(b) and 6-2.

9 3. On April 12, 2024, this Court granted the Parties’ stipulation to continue the mediation
 10 originally scheduled for April 25, 2024, until May 30, 2024, given my unavailability for the
 11 mediation and the Parties’ need to resolve discovery disputes concerning information needed to
 12 conduct a productive mediation.

13 4. The Parties were ready to proceed with mediation on May 30, 2024. However, Dana
 14 Curtis, the mediator this Court selected to mediate the Action, informed the Parties on the
 15 morning of May 28, 2024, that she needs to cancel the mediation scheduled for May 30, 2024, to
 16 tend to a personal emergency.

17 5. The Parties and the mediator are conferring on selecting new mediation date on which
 18 Plaintiff, Defendant, their respective counsel, and the mediator are available, but have not
 19 determined a date that works for all Parties.

20 6. The current deadline for the Parties to complete non-expert discovery is July 18, 2024,
 21 (ECF No. 19).

22 7. The Parties have diligently engaged in written discovery and preparing for mediation in
 23 the Action, but anticipate that additional non-expert discovery, such as depositions, will need to
 24 occur should this matter not resolve at mediation.

25 8. The Parties request additional time to complete non-expert discovery for the Parties to
 26 conserve resources for potential settlement and adequately prepare for trial in the event that
 27 settlement is unsuccessful at the mediation.

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing
2 is true and correct.

3 Executed this 29th day of May 2024 at Alamo, California

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5 _____
6 Angel R. Sevilla

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9 4891-4536-8771, v. 1
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